



**ANSWER:** Defendants admit that Plaintiff is a minor, and that "on or about" December 13, 2007, he was enrolled and present in the KinderCare Learning Center facility located at 1050 Bonaventure Drive, Elk Grove Village, IL., County of Cook and State of Illinois.

4. That at all times mentioned MS. KATHERINE DOE was the employee and agent of one or more of the Defendants, KNOWLEDGE LEARNING CORP., KNOWLEDGE LEARNING CENTERSE INC., KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., KINDERCARE.

**ANSWER:** Defendants lack sufficient information to admit or deny as the subject person in Paragraph 4 is fictitiously named.

5. That at the same time and place, Ms. Katherine Doe tripped and fell and knocked a chair onto the minor, RORY-MORRIS MARTIN ALBRECHT injuring him.

**ANSWER:** Defendants deny the allegations set forth in Paragraph 5.

6. That the Defendants KNOWLEDGE LEARNING CORP., KNOWLEDGE LEARNING CENTERSE INC., KC DEVELOPMENT CORP., KINDERCARE REAL ESTATE LLC., KINDERCARE AND MS. KATHERINE DOE had a duty to use due care and caution for the minor Plaintiff.

**ANSWER:** Defendants admits all duties legally imposed by law but deny that they are adequately pled here.

7. That MS. KATHERINE DOE and or/other agents of one of the defendants was negligent in one or more of the following ways:

- (a) Tripped and fell knocking a chair over onto the Plaintiff's head.
- (b) Failed to seek immediate care for the Plaintiff and his injuries
- (c) Failure to timely notify Allyson Albrecht of her sons injuries.
- (d) Were otherwise careless and negligent.

That as a direct and proximate result of the negligence of the defendants the minor Plaintiff, RORY, has suffered a seizure and, has incurred medical bills, and will incur medical bills in the future.

**ANSWER:** Defendants deny all aggregated allegations contained in Paragraph 7 and its subparagraphs A through D.

FOR RELIEF, Knowledge Learning Corporation, Knowledge Learning Centers, Inc., KC Development Corp., Kindercare Real Estate LLC, and Kindercare request that the Court enter judgment in their favor.

Respectfully submitted,

**KNOWLEDGE LEARNING CORPORATION**

/s/ Timothy L. Binetti  
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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the attached Defendants' Answer to Plaintiff's Complaint was filed electronically and is available for viewing and downloading from the Electronic Case Filing System. A true and correct copy of the foregoing document was served on July 31, 2008 by sending a copy via regular mail, postage prepaid and addressed to:

Joseph G. Klest  
1701 E. Woodfield Road, Ste. 909  
Schaumburg, IL 60173  
(847) 969-9510 (phone)

/s/ Timothy L. Binetti